Lipson Neilson P.C. 900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 (702) 382-1500 – fax (702) 382-1512	1 2 3 4 5 6 7 8	LIPSON NEILSON P.C. J. WILLIAM EBERT, ESQ. Nevada Bar No. 2697 KAREN KAO, ESQ. Nevada Bar No. 14386 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 (702) 382-1500 - Telephone (702) 382-1512 - Facsimile bebert@lipsonneilson.com kkao@lipsonneilson.com Attorneys for Defendant WINE RIDGE ESTATES HOMEOWNERS ASSOCIATION		
	9	UNITED STATES DISTRICT COURT		
	10	DISTRICT OF NEVADA		
	11	WELLS FARGO BANK, N.A., a national banking association;	CASE NO. 2:15-cv-02501-GMN-NJK	
	12	Plaintiff,	STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION	
	13	VS.	DEADLINES	
	14	EAGLE ROCK ASSET MGMT, LLC, a DE	(FIRST REQUEST)	
Lipson Neilson P.C. ington Cross Drive, s Vegas, Nevada 89 ⁻ 2-1500 – fax (702) 3	15	LLC; LEGAL INC., LLC, a NV LLC; WINE RIDGE ESTATES HOMEOWNERS		
Lipson ngton Vegas 2-1500	16	ASSOC, a NV non-profit corp; HAMPTON		
Lipson Neilson P.C. 9900 Covington Cross Drive, Las Vegas, Nevada 89 (702) 382-1500 – fax (702) 3	17	& HAMPTON COLLECT, LLC, a NV LLC; BI JUN CHEN, an individual;		
02)	18	Defendants.		
	19			
	20	Defendants WINE RIDGE ESTATES HOMEOWNERS ASSOCIATION ("HOA"),		
	21	BI JUN CHEN, and LEGAL INC., LLC, and Plaintiff WELLS FARGO BANK, N.A., by		
	22	and through their respective counsel of record, hereby agree and stipulate as that the		
	23	deadline for Defendants WINE RIDGE ESTATES HOMEOWNERS ASSOCIATION, BI		
	24	JUN CHEN, and LEGAL INC., LLC to file their respective Motions for Summary		
	25	Judgment shall be extended two (2) weeks from February 11, 2019, to February 25,		

2019.

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that the Parties have entered into settlement negotiations and would like to continue

Pursuant to Local Rule 6-1(b), the parties state the reason for the extension is

	1	those discussions without incurring the ad	ditional costs of preparing and filing		
	2	dispositive motions against each other. If a	resolution is not reached prior to the		
	3	extended dispositive motion deadline, then the Parties shall proceed with dispositive			
	4	motion practice. This is the Parties' first request for an extension, and is made in good			
	5	faith and not for purpose of delay.			
	6				
	7	DATED this 11 th day of February, 2019. D	ATED this 11 th day of February, 2019.		
	8	LIPSON NEILSON P.C. SI	NELL & WILMER, L.L.P.		
	9	By: <u>/s/ Karen Kao</u> By: J. WILLIAM EBERT, ESQ.	y: <u>/s/ Wayne Klomp</u> JOHN DELIKANAKIS, ESQ.		
	10	Nevada Bar No. 2697 KAREN KAO, ESQ.	Nevada Bar No. 5928 WAYNE KLOMP, ESQ.		
	11	Nevada Bar No. 14386 9900 Covington Cross Drive	Nevada Bar No. 10109 3883 Howard Hughes Pkwy., Ste. 1100		
2 50	12	Suite 120 Las Vegas, Nevada 89144	Las Vegas, Nevada 89169-5958 (702) 784-5200 - Telephone		
Suite 12 44 32-151:	13	(702) 382-1500 - Telephone (702) 382-1512 - Facsimile	(702) 784-5252 – Facsimile jwillis@swlaw.com		
on P.C. Drive, Suite 120 ada 89144 (702) 382-1512	14	<u>bebert@lipsonneilson.com</u> <u>kkao@lipsonneilson.com</u>	wklomp@swlaw.com		
Neilso Cross , Nevi	15	Attorneys for Defendant Wine Ridge	Attorneys for Plaintiff Wells Fargo Bank, N.A.		
Lipson ington Vegas 2-1500	16	Estates Homeowners Association			
Lipson 900 Covington (Las Vegas (702) 382-1500	17	DATED this 11 th day of February, 2019.			
)66	18	HONG & HONG			
	19	By: /s/ Joseph Y. Hong JOSEPH Y. HONG, ESQ.			
	20	Nevada Bar No. 5995			
	21	10781 W. Twain Ave. Las Vegas, Nevada 89135			
	22	(702) 870-1777 - Telephone (702) 870-0500 – Facsimile			
	23	Yosuphonglaw@gmail.com			
	24	Attorneys for Defendants Bi Jun Chen			
	25	and Legal Inc., LLC			
	26	\\\			
	27	\\\			
	28	1			

	1	Wells Fargo Bank, N.A., v. Eagle Rock Asset Mgmt, LLC, et al.			
	2	Case No. 2:15-cv-02501-GMN-NJK			
Lipson Neilson P.C. 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 (702) 382-1500 – fax (702) 382-1512	3				
	4	<u>ORDER</u>			
	5	Based on the foregoing stipulation of the parties,			
	6	IT IS SO ORDERED.			
	7	DATED: _February 12, 2019.			
	8				
	9				
	10	United States Magistrate Judge			
	11	Submitted by:			
	12	LIPSON NEILSON P.C.			
	13	By <u>:_/s/ Karen Kao</u>			
on P.C Drive, ada 89 (702) 3	14	Nevada Bar No. 2697			
Lipson Neilson P.C. ington Cross Drive, S Vegas, Nevada 89 2-1500 – fax (702) 3	15	KAREN KAO, ESQ. Nevada Bar No. 14386			
Lipson Neilson P.C. Covington Cross Drive, Sui Las Vegas, Nevada 89144 382-1500 – fax (702) 382-	16	9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144			
900 Co La (702) 33	17	(702) 382-1500 - Telephone (702) 382-1512 - Facsimile			
6	18	bebert@lipsonneilson.com kkao@lipsonneilson.com			
	19	Attorneys for Defendant WINE RIDGE ESTATES HOMEOWNERS ASSOCIATION			
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